

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

GLENWOOD MANAGEMENT and RON  
SUSSER,

Defendants.

19 Civ. 01596 (AJN)

**NOTICE OF MOTION OF  
TATIANA IATTCHENI AND  
EDUARD GITLIN TO  
INTERVENE PURSUANT TO  
42 USC § 3216(o)(2) and FRCP  
Rule 24(a)**

PLEASE TAKE NOTICE THAT Tatiana Iattcheni (“Iattcheni”) and Eduard Gitlin (“Gitlin”), by and through their undersigned counsel, respectfully moves this Court to permit Iattcheni and Gitlin (“Intervenors”) to intervene in this case for the limited purposed of seeking approval of the proposed Stipulation and Order of Settlement and Dismissal (Dkt # 5) jointly proposed by the United Stated Attorney for the Southern District of New York and counsel for Glenwood Management Corp. and Ron Susser, as of right under 42 USC § 3216(o)(2), and pursuant to Federal Rule of Civil Procedure 24(a).

The basis for the Motion is set forth in the accompanying Memorandum of Law and the Affirmation of John T. Maher (the “Maher Affirmation”), dated February 28, 2019. Intervenor’s proposed intervention arises from their prior concluded proceeding before the U.S. Department of Housing and Urban Development (“HUD”) as well as the related civil matter civil action filed under the caption *Iattcheni and Eduard Gitlin v. West 64th Street LLC, Glenwood Management Corp., and Ron Susser*, No. 18-cv-7249 (S.D.N.Y.) on August 10, 2018.

Dated: February 28, 2019  
New York, New York

    /s/ JTM      
John T. Maher, Esq.  
Law Office of John T. Maher  
*Attorneys for Plaintiffs*  
105 East 122<sup>nd</sup> St.,  
New York, New York 10035  
(646) 675 8909  
Email: [johnmaher@yahoo.com](mailto:johnmaher@yahoo.com)